UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

MEMORANDUM

DATE: June 19, 1998

SUBJ: Request for a Removal Action
Rogers Fibre Mill Site
Bar Mills, Maine - Action Memorandum

FROM: Janis K. Tsang, P.E., On-Scene Coordinator
Site Evaluation and Response Section I

TO: Patricia L. Meaney, Director
Office of Site Remediation and Restoration

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of the proposed removal action described herein for the Rogers Fibre Mill Site, ("Site") in Bar Mills, Maine. Hazardous substances in drums and containers along with friable asbestos in piles stored inside a structurally unsound building at the Site, if not addressed by implementing the response actions selected in this Action Memorandum, will continue to pose a threat to human health and the environment.

II. SITE CONDITIONS AND BACKGROUND

SITE ID #: 015Z
CERCLIS ID #: MED000242578
Category of Removal: Time-critical

A. SITE DESCRIPTION

1. Background

The Site was used as a manufacturing facility of the fiberboard industry from approximately 1917 to 1980 by Rogers Fibre Co. which merged with Colonial Board Company (CBC) in 1967 and became known as CBC's Rogers Fibre Division. The manufacturing processes actually used are unknown. Since the facility was abandoned, unknown materials in tanks and other containers were left in the mill. The mill structure has deteriorated to the extent that portions of the mill have collapsed. On June 3, 1997, the Site was referred to EPA by the Honorable Olympia J.

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Snowe, United States Senator, as a potential removal site.

2. Removal Site Evaluation

On September 25, 1997, a preliminary assessment and site investigation (PA/SI) was conducted by On-Scene Coordinator (OSC) MaryEllen Stanton and members of the Roy F. Weston Superfund Technical Assistance and Response Team (Weston-START). Access to the Site was unrestricted, and there was evidence of trespassing and vandalism throughout a portion of the facility. Several 55-gallon drums and 1-gallon containers of unknown substances were found in the various locations. Two metal tanks, one wooden tank, and one concrete vault were observed in the basement, and three rotating metal tanks were observed on the second floor of the main mill building. Due to the poor structural condition of the building and in light of personal health and safety concerns, verification of the content or the condition of each tank or a complete inventory of the drums and containers inside the building was not performed.

Friable asbestos debris and non-friable asbestos-containing roofing shingles were scattered at various locations throughout as well as outside the main building. The presence of asbestos is likely a result of deterioration of piping and equipment insulation, and degradation of the roof. Broken windows were observed throughout the building.

A total of eight samples were taken:

four solid samples for asbestos analyses;

one solid sample for metals, pesticide (pest)/polychlorinated biphenyls (PCBs) analyses;

two samples (one solid sample collected from a tank and one liquid sample collected from the river bank) for metals analysis; and,

one solid sample for metals, pest/PCB, pH, flashpoint, and volatile organic compounds (VOC) analyses.

Laboratory results indicate that three of the four samples contained up to 95 percent of asbestos. One solid sample from a tank is found to be contaminated with VOCs such as methylene chloride (700 ug/g (parts-per-million (ppm)), carbon tetrachloride (130 ppm) and benzene (30 ppm). One solid sample from a floor contains copper (550 ppm), zinc (510 ppm) and lead (1000 ppm).

3. Physical Location and Site Characteristics

The Site is an abandoned fiberboard mill facility located in a residential area on Depot Street, Bar Mills, York County, Maine. Bar Mills is a village of the Town of Buxton. The Site is further described as Lots 46 and 47 on Buxton Tax Map 12. The combined total area of the two lots is approximately 1.94 acres. The Site is bounded by Depot Street to the northeast, by residential properties to the southeast and northwest, and by the Saco River to the southwest.

The Site consists of a single one to three-story main mill building centered with a large water tower, a smoke stack, two separate unfenced parking areas and a small single house. The main mill building is over 100 years old, covers approximately 56,360 square feet, and is the result of various additions done over the years. According to a Buxton Town official, the small single house is currently occupied by a family with some young children.

The main mill building is situated adjacent to and partially above the Saco River with a water sluiceway flowing under/through a portion of the building. The majority of the mill building is in a state of disrepair, with portions having collapsed on to themselves or into the Saco River. Adjacent to the main mill building is a dam and hydroelectric plant operated by Central Maine Power Company.

Approximately 57 residential homes are located within a quarter mile and an elementary school is located approximately half a mile from the Site.

Saco River is classified as a Class A river under the Maine State Water Classification Program. According to the Saco River Corridor Commission, the river supplies more than two billion gallons of drinking water annually to the cities and towns of Saco, Biddeford, Old Orchard Beach (OOB), Kennebunk, portions of Scarborough and Kennebunkport. It is also used for recreational activities such as canoeing and fishing.

4. Release or Threatened Release into the Environment of a Hazardous Substance or Pollutant or Contaminant

As indicated in the above, laboratory results indicate that three of the four samples contained up to 95% asbestos. One solid sample from a tank was found to be contaminated with VOCs such as methylene chloride (700 ppm), carbon tetrachloride (130 ppm) and benzene (30 ppm). One solid sample from a floor contained copper (550 ppm), zinc (510 ppm) and lead (1000 ppm). These compounds are hazardous substances as defined by Section 101(14) of CERCLA.

Hazardous substances located in the building could be released

into the environment by continued deterioration of the building, vandalism, and/or weather conditions.

5. NPL Status

The Site is not on the National Priorities List (NPL) and has neither received a Hazard Ranking System rating nor is being evaluated by the Agency for Toxic Substances and Disease Registry (ATSDR).

B. OTHER ACTIONS TO DATE

1. Previous Actions Conducted by State and Local Officials

According to the Town and Senator Snowe's office, the Town of Buxton has made many unsuccessful attempts to have the property owners address the hazards presented by the Site.

On May 17, 1990, the Maine Department of Environmental Protection (ME DEP) conducted a site inspection in which it revealed a number of violations of Maine's Hazardous Waste Management Rules. The violations included, but were not limited to,

failure to implement hazardous waste determination,
failure to properly store hazardous waste,
failure to properly label the containers of hazardous waste, and
failure to manage waste to prevent or minimize risk to the environment.

Hazardous waste including paints containing solvents, muriatic acid, and flammable liquid resin were noted in the inspection. Subsequently, on May 30, 1990, ME DEP sent a Notice of Violation to the PRP.

According to the OSC's recent personal communication with ME DEP, the facility has also had other violations.

C. STATE ROLES

According to state file records, written correspondences submitted by the attorney representing the property owner, indicated that his client would conduct the removal of oil and hazardous substances at the facility. A consent decree and order was issued by the ME DEP to the property owner on October 18, 1996 requiring him to conduct monitoring of the structural integrity of the building and preventing any discharges of solid waste to the Saco River. Apparently, the property owner did not perform either the removal of hazardous substances or monitoring the structural integrity of the building.

Due to insufficient financial resources to remove hazardous substances from the Site by the State and local authorities, on

June 3, 1997, the Town of Buxton has requested, through Senator Snowe, assistance from EPA. On April 8, 1998, EPA also received similar request from ME DEP.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

A. THREATS TO PUBLIC HEALTH OR WELFARE

Hazardous substances at this Site, as defined by Section 101(14) of CERCLA, include asbestos, methylene chloride, carbon tetrachloride, benzene, lead, copper and zinc. Pathways of exposure to the above hazardous substances are inhalation, ingestion, absorption and direct contact. The following table shows the results of exposure.

Hazardous Substance	Results of Exposure
asbestos	asbestosis, lung cancer and mesothelioma, a rare cancer of the outer lining of the lung.
methylene chloride	damage to the central nervous system, cardiovascular system, eyes and skin.
carbon tetrachloride	damage to the central nervous system, eyes, lungs, liver, kidneys and skin.
benzene	damage to blood, central nervous system, skin, bone marrow, eyes and respiratory system.
lead	damage to kidney function, neurological processes, and reproductive function. Children who are exposed to lead can experience problems in learning abilities and physical growth because lead can cause damage to the brain and the central nervous system.

The building is in a state of disrepair with portions having collapsed on to themselves or into the Saco River. Containers of hazardous substances located in the building may release due to poor storage conditions (collapsing building), weather conditions or vandalism. The release of the containers' contents could contaminate the river water, threaten the drinking water supply and pose public health threat from ingestion of contaminated water.

B. THREATS TO THE ENVIRONMENT

As stated above, the containers located inside the partial

collapsed building could release the contents to the environment due to ongoing deterioration of the building, weather conditions and/or vandalism.

Saco River Salmon Club (SRSC) annually stocks young salmon into the river's tributaries in an effort to restore Atlantic salmon to the Saco River watershed. The Maine Department of Inland Fisheries and Wildlife (MEIF&W) has annually stocked the Saco River with approximately 1,800 Brook and Brown Trout. Approximately 200 trout are actually stocked at the Bar Mills Dam by the Site. The hazardous substances found onsite could contaminate the neighborhood and the Saco River and pose a serious environmental threat.

Salmonid species, particularly juvenile of the species, are known to be quite sensitive to the degradation of the water quality conditions. It is possible that the building, if left to deteriorate, could collapse into the river, releasing contaminants. At this time, with the limited data available, the extent or magnitude of risk posed by the Site to the aquatic community is uncertain. However, considering the fisheries stocking and restoration effort currently in progress, the opportunity for reducing the potential risk of water quality degradation subsequently impacting these efforts should be taken.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. PROPOSED ACTIONS

1. Proposed action description

Proposed actions include, but are not limited to, the following:

(1) if necessary and possible, temporarily relocate affected residents on-site via an Interagency Agreement with the US Army Corps of Engineers (USACE);
(2) wherever accessible, conduct asbestos and drums/tank removal;
(3) demolition of the main mill building;
(4) conduct inventory, sampling and analysis of the contents of the drums, tanks and other containers;
(5) dispose of any identified hazardous substances and contaminated materials at EPA-approved disposal facilities;

and,
(6) coordinate with the state and local authorities for disposal of uncontaminated building debris.

The OSC will consult with USACE, coordinate with the Central Maine Power regarding the dam, and consult/coordinate with the EPA Environmental Response Team (EPA/ERT), F&WS, state and local environmental communities to address water quality issues raised regarding the removal action. The OSC may collect water and river sediment samples from the River to monitor the water quality, if necessary.

2. Description of alternative technologies

When possible, the OSC will coordinate with the state and local authorities and other private entities to reuse or recycle the building materials. Recycling, incineration or treatment are the preferred methods of disposal for hazardous substances present in bulk containers. When applicable, the OSC will review potential alternative technologies to determine the most cost-effective and environmentally beneficial method to treat/dispose of the hazardous substances depending on the waste volume and waste characteristics.

3. Applicable or relevant and appropriate requirements (ARARs)

The OSC will request DEP to identify State ARARs. The OSC will determine which State ARARs are practicable for this removal action.

Federal ARARs tentatively identified at this time are: RCRA regulations 40 CFR §§ 265.170-177 (Use and Management of Containers) and 265.194-196 (Tank Systems), Floodplains Management (Executive Order 11988) and Protection of Wetlands (Executive Order 11990).

The following administrative and substantive requirements were determined to be applicable to off-site actions:

RCRA and Department of Transportation (DOT) requirements for the transportation of hazardous waste/materials (manifest requirements, storage, and labeling of waste). Additional ARARs may be identified as the removal action progresses in accordance with selected cleanup methods and disposal/treatment options. Federal ARARs will be met to the extent practicable according to existing circumstances.

4. Project Schedule

The OSC estimates that this removal action will take approximately eight months to complete. Removal activities will be

commenced upon the approval of this action memorandum.

B. PROPOSED COSTS

- EXTRAMURAL COSTS:		
o Regional Allowance Costs:		
ERCS	$ 500,000	
o Other Extramural Costs:		
START	100,000	
ERT/REAC	50,000	
US ACE	50,000	
o Subtotal, Extramural Costs:	$ 700,000	
o 20% Extramural Project Contingency:	$ 140,000	
* TOTAL EXTRAMURAL COSTS AND CONTINGENCY:		$ 840,000
- INTRAMURAL COSTS:		
o Direct and Indirect Costs:	$ 100,000	
o 20% Intramural Contingency :	$ 20,000	
* TOTAL INTRAMURAL COSTS AND CONTINGENCY:		$ 120,000
TOTAL REMOVAL PROJECT CEILING:		$ 960,000

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Delayed action will increase public health risks to adjacent occupants as well as environmental risks to the Saco River. The situation is currently unstable. Any further delays in this action will add to the likelihood of a release through a number of circumstances, i.e., building deterioration, weather conditions and/or vandalism.

VII. OUTSTANDING POLICY ISSUES

None

VIII. ENFORCEMENT

ATTACHED HERETO FOR INTERNAL DISTRIBUTION ONLY.

X. RECOMMENDATION

This decision document represents the selected removal action for the Rogers Fiber Mill Site in Bar Mills, Maine. It was developed in accordance with CERCLA, as amended, and is consistent with the National Contingency Plan (NCP). This decision is based on the administrative record file for the Site.

Conditions at the Rogers Fiber Mill Site meet the NCP Section 300.415(b)(2) criteria for a removal action in that there are:

"Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants" [300.415(b)(2)(i)];

"Actual or potential contamination of drinking water supplies or sensitive ecosystems" [300.415(b)(2)(ii)];

"Hazardous substances or pollutants or contaminants in drums, barrels, tanks or other bulk storage containers, that may pose a threat of release" [300.415(b)(2)(iii)];

"Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released" [300.415(b)(2)(v)];

"The availability of other appropriate federal or state response mechanisms to respond to the release" [300.415(b)(2)(vii)]; and,

"Other situations or factors that may pose threats to public health or welfare or the environment" [300.415(b)(2)(viii)].

Therefore, I recommend approval of this removal action. The estimated project ceiling is $960,000, of which $840,000 is for extramural contractor costs.

Approved: _____ Date 6/23/98

Disapproved: _____ Date _____